

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

KIRK DOUGLAS, individually and on behalf of all others similarly situated,

Plaintiffs,

vs.

ALLIED UNIVERSAL SECURITY SERVICES
ALLIED BARTON SECURITY SERVICES LLC
and ALLIED SECURITY HOLDING LLC,

Defendants.

Civil Action No. 1:17-cv-6093

**NOTICE OF MOTION FOR
UNOPPOSED PRELIMINARY
APPROVAL OF AMEND CLASS
SETTLEMENT**

PLEASE TAKE NOTICE that, based upon the accompanying Memorandum of Law in Support of Plaintiff's Unopposed Motion for Preliminary Approval of the Class Settlement, the Declaration of Christopher Q. Davis submitted herewith, and all the pleadings and proceedings heretofore had herein, the undersigned respectfully move this Court, before the Honorable Sanket J. Bulsara, United States Magistrate Judge, in the United States District Court for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, NY 11201, for an order:

(1) preliminary approving the settlement reached by the parties in this action as embodied in their Amended Settlement Agreement (the "Amended Settlement" or the "Amended Settlement Agreement") submitted herewith;

(2) provisionally certifying the following settlement classes under Federal Rule of Civil Procedure 23 in connection with the settlement process:

(a) all present and former persons employed as Airport Security Agents, Operation Assistants, or Tour Supervisors at JFK by Defendants at any time between September 1, 2013 and May 28, 2019.

(3) provisionally certifying the following settlement class under the Fair Labor Standards Act, 29 U.S.C. § 216(b) in connection with the settlement process:

- (a) all present and former persons employed as Airport Security Agents, Operation Assistants, or Tour Supervisors at JFK by Defendants at any time between October 18, 2014 and May 28, 2019.

(4) approving the proposed Notice of Class Action Settlement attached to the Settlement Agreement as Exhibit 1;

(5) appointing The Law Office of Christopher Q. Davis, PLLC, as Class Counsel;

(6) appointing RG2 Claims Administration as the Administrator; and

(7) approving the Parties' proposed schedule for final settlement approval.

Please find the Plaintiff's **[Proposed] Order Granting Preliminary Approval and Settlement Hearing attached to the Settlement Agreement as Exhibit 2**. Additionally, attached hereto as Exhibit A, please find the parties **[Proposed] Schedule for Administration of Notices and Final Settlement Approval**, also incorporated by reference into Exhibit 2 of the Settlement Agreement.

Dated: September 13, 2019
New York, NY

**THE LAW OFFICE OF
CHRISTOPHER Q. DAVIS, PLLC**

/s/
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